

Glenn D. Zimmerman  
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Attorney for Jennie Massey

The United States of America,

Plaintiff,

vs.

Jennie Massey,

Defendant

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DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

Case No.: No. 2:06CR-00287-UWC

**MOTION TO EXTEND TIME FOR FILING**

**COMES NOW, GLENN D. ZIMMERMAN**, Attorney for the Defendant in the above styled cause and prays this Honorable Court to EXTEND the time for filing Voir Dire Questions and Jury Instructions and as grounds for this motion the undersign states as follows:

1. That the government has failed to provide adequate discovery and the Defendant has been working on getting adequate discovery to prepare for trial.
2. That due to the last minute discovery of material evidence which the government has not turned over, the Defendant was not able to submit the proposed jury questions and voir dire in a timely fashion.
3. That Defendant requests an extension of time under Rule 45 (b) (1) (B) , Federal Rules of Criminal Procedure.
4. That the Defendant is filing jury instructions and voir dire concurrently with this motion.

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2 **RESPECTFULLY SUBMITTED** this the 31<sup>st</sup> day of January 2007.

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6 Glenn D. Zimmerman (ZIM002)  
7 Attorney for Jennie Massey  
8 3379 Watchman Drive  
9 Montgomery, Alabama 36116  
10 Telephone:(334) 273-1261

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that I have served a copy of the foregoing document has been served on  
13 counsel listed below by placing a copy of the same in the United States mail postage prepaid and  
14 properly addressed on this the 31<sup>st</sup> day of January, 2007.

15 Leura Canary,  
16 U.S. Attorney for  
17 The Middle District of Alabama  
18 1 Church Street  
19 Montgomery, Alabama 36102

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Glenn D. Zimmerman